

MAY 01 2017

FCC Mailroom

April 27, 2017

**IMPORTANT NOTICE REGARDING COMPLIANCE & REPORTING**

Federal Communications Commission  
Attn: Assistant Division Chief, Pricing Policy Division, Room 5-A121  
445 12th Street, S.W., Room TW B204  
Washington, D.C. 20554

**Re: Policy and Rules Concerning the Interstate, Interexchange Marketplace;  
Implementation of Section 254(g) of the Communications Act of 1934, as  
Amended; CC Docket No. 96-61 For 2015**

Dear Ms. Dortch:

On behalf of Alliance Telecom Inc.; BendTel, Inc.; Connect First, Inc.; Global Telco Group, Inc.; Grasshopper Group, LLC; Metropolitan Telecommunications Holding Company; Miron Enterprises LLC; PLDT (US) Ltd; PLDT (US) Mobility, LLC; Telax Voice Solutions Inc.; Tello, LLC; Teleplus, LLC; Vail Systems, Inc.; Vodafone US Inc.; Worldvox Corporation; Ztar Mobile, Inc, transmitted herewith is an original plus four (4) copies of its 2015 Certification of Compliance with the Federal Communications Commission's geographic rate averaging and rate integration requirements pursuant to 47 C.F.R. § 64.1900.

Please contact Marsha Pokorny at (850) 971-5335 or [map@compliancegroup.com](mailto:map@compliancegroup.com) with any questions concerning this filing. Thank you for your assistance in this matter.

Sincerely,

*Marsha A. Pokorny*

Marsha Pokorny  
The Compliance Group  
Managing Consultant  
Telephone: (850) 971-5335  
Email: [map@compliancegroup.com](mailto:map@compliancegroup.com)

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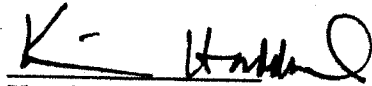
Ztar Mobile, Inc.

Section 64.1900 Geographic Rate Averaging

**CERTIFICATION OF COMPLIANCE**

I, Kevin Haddad, hereby certify that I am the President of Ztar Mobile, Inc. ("Ztar Mobile"), and that I am authorized to execute this certification on behalf of Ztar Mobile and its telecommunications subsidiaries.

Furthermore, I hereby swear under oath that, to the best of my knowledge, information and belief, Ztar Mobile complies with the geographic rate averaging and rate integration obligations pursuant to Section 254 (g) of the Communications Act of 1934, as amended, in providing detariffed interstate, domestic, interexchange services.



Kevin Haddad  
On behalf of Ztar Mobile, Inc.

DATE: 4/21/2017

**Worldvox Corporation**  
**Section 64.1900 Geographic Rate Averaging**  
**CERTIFICATION OF COMPLIANCE**

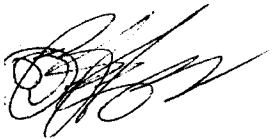
Received & Inspected

MAY - 1 2017

FCC Mailroom

I, Ryan Snapper, hereby certify that I am the President of Worldvox Corporation ("Worldvox"), and that I am authorized to execute this certification on behalf of Worldvox and its telecommunications subsidiaries.

Furthermore, I hereby swear under oath that, to the best of my knowledge, information and belief, Worldvox complies with the geographic rate averaging and rate integration obligations pursuant to Section 254 (g) of the Communications Act of 1934, as amended, in providing detariffed interstate, domestic, interexchange services.



Ryan Snapper  
On behalf of Worldvox Corporation

DATE: 12-16-2016

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Vodafone US Inc.

Section 64.1900 Geographic Rate Averaging

MAY - 1 2017

**CERTIFICATION OF COMPLIANCE**

FCC Mailroom

I, Bryan Ganno, hereby certify that I am the Assistant Treasurer of Vodafone US Inc. ("Vodafone US"), and that I am authorized to execute this certification on behalf of Vodafone US and its telecommunications subsidiaries.

Furthermore, I hereby swear under oath that, to the best of my knowledge, information and belief, Vodafone US complies with the geographic rate averaging and rate integration obligations pursuant to Section 254 (g) of the Communications Act of 1934, as amended, in providing detariffed interstate, domestic, interexchange services.

A handwritten signature in black ink, appearing to read "Bryan Ganno", with a horizontal line extending to the right.

Bryan Ganno  
On behalf of Vodafone US Inc.

DATE: 4-21-2017

Vail Systems, Inc.

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Section 64.1900 Geographic Rate Averaging

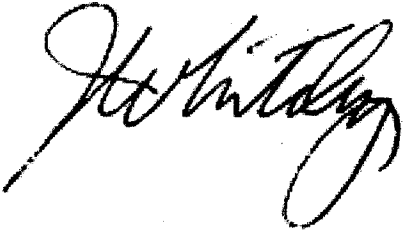
MAY - 1 2017

CERTIFICATION OF COMPLIANCE

FCC Mailroom

I, James Whiteley, hereby certify that I am the CEO of Vail Systems, Inc. ("Vail Systems"), and that I am authorized to execute this certification on behalf of Vail Systems and its telecommunications subsidiaries.

Furthermore, I hereby swear under oath that, to the best of my knowledge, information and belief, Vail Systems complies with the geographic rate averaging and rate integration obligations pursuant to Section 254 (g) of the Communications Act of 1934, as amended, in providing detariffed interstate, domestic, interexchange services.

A handwritten signature in black ink, appearing to read "J. Whiteley", written in a cursive style.

James Whiteley  
On behalf of Vail Systems, Inc.

DATE: 4-21-2017

Received & Inspected

Tello, LLC

MAY - 1 2017

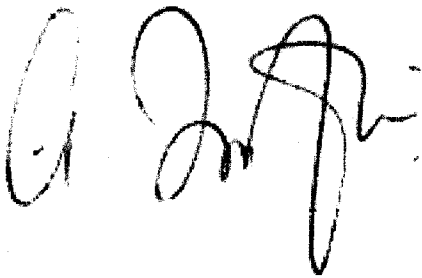
**Section 64.1900 Geographic Rate Averaging**

FCC Mailroom

**CERTIFICATION OF COMPLIANCE**

I, Abdul Tawab Molvi, hereby certify that I am the CFO of Tello, LLC ("Tello"), and that I am authorized to execute this certification on behalf of Tello and its telecommunications subsidiaries.

Furthermore, I hereby swear under oath that, to the best of my knowledge, information and belief, Tello complies with the geographic rate averaging and rate integration obligations pursuant to Section 254 (g) of the Communications Act of 1934, as amended, in providing detariffed interstate, domestic, interexchange services.

A handwritten signature in black ink, appearing to read 'A. T. Molvi', is written over a faint, circular official stamp.

Abdul Tawab Molvi  
On behalf of Tello, LLC

DATE: 4-21-2017

Received & Inspected

MAY - 1 2017

FCC Mailroom

**Teleplus, LLC**

**Section 64.1900 Geographic Rate Averaging**

**CERTIFICATION OF COMPLIANCE**

I, Amr Ibrahim, hereby certify that I am the CEO of Teleplus, LLC ("Teleplus"), and that I am authorized to execute this certification on behalf of Teleplus and its telecommunications subsidiaries.

Furthermore, I hereby swear under oath that, to the best of my knowledge, information and belief, Teleplus complies with the geographic rate averaging and rate integration obligations pursuant to Section 254 (g) of the Communications Act of 1934, as amended, in providing detariffed interstate, domestic, interexchange services.

A handwritten signature in black ink, appearing to read 'Amr Ibrahim', with a stylized flourish at the end.

Amr Ibrahim  
On behalf of Teleplus, LLC

DATE: 4-21-2017

Received & Inspected

**Telax Voice Solutions Inc.**

MAY -1 2017

**Section 64.1900 Geographic Rate Averaging**

FCC Mailroom

**CERTIFICATION OF COMPLIANCE**

I, Taras Kapanaike, hereby certify that I am the Vice President of Telax Voice Solutions Inc. ("Telax"), and that I am authorized to execute this certification on behalf of Telax and its telecommunications subsidiaries.

Furthermore, I hereby swear under oath that, to the best of my knowledge, information and belief, Telax complies with the geographic rate averaging and rate integration obligations pursuant to Section 254 (g) of the Communications Act of 1934, as amended, in providing detariffed interstate, domestic, interexchange services.

*Taras Kapanaike*

Taras Kapanaike  
On behalf of Telax Voice Solutions Inc.

DATE: 4-21-2017



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**PLDT (US) Mobility, LLC**

**Section 64.1900 Geographic Rate Averaging**

**CERTIFICATION OF COMPLIANCE**

I, Evarcito Ocampo, hereby certify that I am the Manager of PLDT (US) Mobility, LLC ("PLDT Mobility"), and that I am authorized to execute this certification on behalf of PLDT Mobility and its telecommunications subsidiaries.

Furthermore, I hereby swear under oath that, to the best of my knowledge, information and belief, PLDT Mobility complies with the geographic rate averaging and rate integration obligations pursuant to Section 254 (g) of the Communications Act of 1934, as amended, in providing detariffed interstate, domestic, interexchange services.

A handwritten signature in black ink, appearing to be 'Evarcito Ocampo', written in a cursive style.

Evarcito Ocampo  
On behalf of PLDT (US) Mobility, LLC

DATE: 4-21-2017

Received & Inspected

**PLDT (US) Ltd**

MAY - 1 2017

**Section 64.1900 Geographic Rate Averaging**

**CERTIFICATION OF COMPLIANCE**

FCC Mailroom

I, Evarcito Ocampo, hereby certify that I am the General Manager of PLDT (US) Ltd ("PLDT (US)"), and that I am authorized to execute this certification on behalf of PLDT (US) and its telecommunications subsidiaries.

Furthermore, I hereby swear under oath that, to the best of my knowledge, information and belief, PLDT (US) complies with the geographic rate averaging and rate integration obligations pursuant to Section 254 (g) of the Communications Act of 1934, as amended, in providing detariffed interstate, domestic, interexchange services.



Evarcito Ocampo  
On behalf of PLDT (US) Ltd

DATE: 4-21-2017

**Miron Enterprises, LLC**

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**Section 64.1900 Geographic Rate Averaging**

MAY - 1 2017

**CERTIFICATION OF COMPLIANCE**

FCC Mailroom

I, Silvana Tatu, hereby certify that I am the Managing Director of Miron Enterprises, LLC ("Miron Enterprises (Keep Calling)"), and that I am authorized to execute this certification on behalf of Miron Enterprises (Keep Calling) and its telecommunications subsidiaries.

Furthermore, I hereby swear under oath that, to the best of my knowledge, information and belief, Miron Enterprises (Keep Calling) complies with the geographic rate averaging and rate integration obligations pursuant to Section 254 (g) of the Communications Act of 1934, as amended, in providing detariffed interstate, domestic, interexchange services.



Silvana Tatu  
On behalf of Miron Enterprises, LLC

DATE: 4-21-2017

**Metropolitan Telecommunications Holding Company**

**Section 64.1900 Geographic Rate Averaging**

**CERTIFICATION OF COMPLIANCE**

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MAY - 1 2017

FCC Mailroom

I, Ralph Dichy, hereby certify that I am the Vice President of Metropolitan Telecommunications Holding Company ("MetTel"), and that I am authorized to execute this certification on behalf of MetTel and its telecommunications subsidiaries.

Furthermore, I hereby swear under oath that, to the best of my knowledge, information and belief, MetTel complies with the geographic rate averaging and rate integration obligations pursuant to Section 254 (g) of the Communications Act of 1934, as amended, in providing detariffed interstate, domestic, interexchange services.



Ralph Dichy

On behalf of Metropolitan Telecommunications Holding Company

DATE: 4/25/2017

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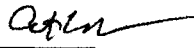
**Grasshopper Group, LLC**

**Section 64.1900 Geographic Rate Averaging**

**CERTIFICATION OF COMPLIANCE**

I, Chris Bohlin, hereby certify that I am the Vice President of Grasshopper Group, LLC ("Grasshopper"), and that I am authorized to execute this certification on behalf of Grasshopper and its telecommunications subsidiaries.

Furthermore, I hereby swear under oath that, to the best of my knowledge, information and belief, Grasshopper complies with the geographic rate averaging and rate integration obligations pursuant to Section 254 (g) of the Communications Act of 1934, as amended, in providing detariffed interstate, domestic, interexchange services.



Chris Bohlin  
On behalf of Grasshopper Group, LLC

DATE: 4/24/2017

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Global Telco Group, Inc.

MAY - 1 2017

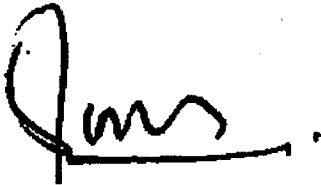
Section 64.1900 Geographic Rate Averaging

**CERTIFICATION OF COMPLIANCE**

FCC Mailroom

I, Kamal Sandhu, hereby certify that I am the CEO of Global Telco Group, Inc. ("Global Telco Group"), and that I am authorized to execute this certification on behalf of Global Telco Group and its telecommunications subsidiaries.

Furthermore, I hereby swear under oath that, to the best of my knowledge, information and belief, Global Telco Group complies with the geographic rate averaging and rate integration obligations pursuant to Section 254 (g) of the Communications Act of 1934, as amended, in providing detariffed interstate, domestic, interexchange services.

A handwritten signature in black ink, appearing to read 'K. Sandhu', with a horizontal line underneath.

Kamal Sandhu  
On behalf of Global Telco Group, Inc.

DATE: 12-16-2016

Received & Inspected

Connect First, Inc.

Section 64.1900 Geographic Rate Averaging

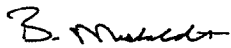
MAY - 1 2017

**CERTIFICATION OF COMPLIANCE**

FCC Mailroom

I, Brian Musfeldt, hereby certify that I am the CFO of Connect First, Inc. ("Connect First"), and that I am authorized to execute this certification on behalf of Connect First and its telecommunications subsidiaries.

Furthermore, I hereby swear under oath that, to the best of my knowledge, information and belief, Connect First complies with the geographic rate averaging and rate integration obligations pursuant to Section 254 (g) of the Communications Act of 1934, as amended, in providing detariffed interstate, domestic, interexchange services.



Brian Musfeldt  
On behalf of Connect First, Inc.

DATE: 4-21-2017

**BendTel, Inc.**

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**Section 64.1900 Geographic Rate Averaging**

**MAY - 1 2017**

**CERTIFICATION OF COMPLIANCE**

**FCC Mailroom**

I, Thomas Barrett, hereby certify that I am the CEO of BendTel, Inc. ("BendTel"), and that I am authorized to execute this certification on behalf of BendTel and its telecommunications subsidiaries.

Furthermore, I hereby swear under oath that, to the best of my knowledge, information and belief, BendTel complies with the geographic rate averaging and rate integration obligations pursuant to Section 254 (g) of the Communications Act of 1934, as amended, in providing detariffed interstate, domestic, interexchange services.

A handwritten signature in black ink, appearing to read 'Thomas Barrett', with a stylized, cursive script.

Thomas Barrett  
On behalf of BendTel, Inc.

DATE: 4-21-2017



Alliance Telecom Inc.

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Section 64.1900 Geographic Rate Averaging

MAY - 1 2017

**CERTIFICATION OF COMPLIANCE**

FCC Mailroom

I, AAMIR RETIWALLA, hereby certify that I am the Vice President of Alliance Telecom Inc. ("Alliance Telecom"), and that I am authorized to execute this certification on behalf of Alliance Telecom and its telecommunications subsidiaries.

Furthermore, I hereby swear under oath that, to the best of my knowledge, information and belief, Alliance Telecom complies with the geographic rate averaging and rate integration obligations pursuant to Section 254 (g) of the Communications Act of 1934, as amended, in providing detariffed interstate, domestic, interexchange services.

A handwritten signature in black ink, appearing to read 'Aamir Retiwalla', written over a horizontal line.

AAMIR RETIWALLA

On behalf of Alliance Telecom Inc.

DATE: 4-21-2017